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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
DIVISION

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MICHAEL W. DOBBINS
CLERK, U. S. DISTRICT COURT

JUDGE GETTLEMAN

CIVIL ACTION

NO. **00C 7230**
(Case number will be supplied by the assignment)

MAGISTRATE JUDGE BOBRICK

GERALD FIGGS

(Name of the plaintiff or plaintiffs)

V.

clerk)

CONNIE GEPNER

HABITAT CORP.

HURON PLAZA 30 E. HURON
(Name of the defendant or defendants)

COMPLAINT OF EMPLOYMENT DISCRIMINATION

1. This is an action for employment discrimination.

2. The plaintiff is GERALD FIGGS of
the county of COOK in the state of ILLINOIS.

3. The defendant is CONNIE GEPNER Mgr. Huron Plaza, who
resides at (street address) 30 E. HURON
(city) CHICAGO (county) COOK (state) ILL. (ZIP) 60622
(Defendant's telephone number) 312-951-9000

4) The plaintiff sought employment or was employed by the defendant at

(street address) 30 E. HURON
 (city) CHICAGO (county) COOK (state) IL (ZIP code) 60615

5. The plaintiff [check one box]

- (a) ☐ was denied employment by the defendant.
 (b) ☐ was hired and is still employed by the defendant.
 (c) ☒ was employed but is no longer employed by the defendant.

6. The defendant discriminated against the plaintiff on or about, or beginning on or about,

(month) 3, (day) 01, (year) 2000.

7. (a) The plaintiff [check one box] ☐ *has not* filed a charge or charges against the defendant
☒ *has*
 asserting the acts of discrimination indicated in this complaint with any of the following
 government agencies:

(i) ☒ the United States Equal Employment Opportunity Commission on or about
 (month) 07 (day) 20 (year) 2000.

(ii) ☐ the Illinois Department of Human Rights on or about
 (month) _____ (day) _____ (year) _____.

(b) If charges *were* filed with an agency indicated above, a copy of the charge is
 attached. ☒ YES ☐ NO

It is the policy of both the Equal Employment Opportunity Commission and the Illinois
 Department of Human Rights to cross-file with the other agency all charges received. The
 plaintiff has no reason to believe that this policy was not followed in this case.

8. (a) ☐ the United States Equal Employment Opportunity Commission has not issued a *Notice of Right to Sue*.
- (b) ☒ the United States Equal Employment Opportunity Commission has issued a *Notice of Right to Sue*, which was received by the plaintiff on (month) 08 (day) 29 (year) 2000 a copy of which *Notice* is attached to this complaint.

9. The defendant discriminated against the plaintiff because of the plaintiff's [check all that apply]

- (a) ☐ Age (Age Discrimination Employment Act).
- (b) ☒ Color (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (c) ☐ Disability (Americans with Disabilities Act)
- (d) ☐ National Origin (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (e) ☒ Race (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (f) ☐ Religion (Title VII of the Civil Rights Act of 1964)
- (g) ☐ Sex (Title VII of the Civil Rights Act of 1964)

10. The plaintiff is suing the defendant, a state or local government agency, for discrimination on the basis of race, color, or national origin (42 U.S.C. §1983). ☒ YES ☐ NO

11. Jurisdiction over the statutory violation alleged is conferred as follows: over Title VII claims by 28 U.S.C. §1331, 28 U.S.C. §1343(a)(3), and 42 U.S.C. §2000e-5(f)(3); over 42 U.S.C. §1981 and §1983 by 42 U.S.C. §1988; over the A.D.E.A. by 42 U.S.C. §12117.

12. The defendant [check all that apply]

- (a) ☐ failed to hire the plaintiff.
(b) ☐ terminated the plaintiff's employment.
(c) ☐ failed to promote the plaintiff.
(d) ☐ failed to reasonably accommodate the plaintiff's religion.
(e) ☐ failed to reasonably accommodate the plaintiff's disabilities.
(f) ☒ other

(specify): HARASSED VERBALLY, DISCRIMINATED AGAINST
FOR BREAKS, DENIED WATER, RECEIVED WRITTEN WARNINGS
SUSPENDED AGAINST COMPANY PROTOCOL. TOLD TO
SHUT UP! AT MEETINGS REQUESTED BY PLAINTIFF
BELITTLED & BERATES VERBALLY & PHYSICALLY;
OTHER AFRICAN-AMERICAN DOORPERSON CALLED OBSCENE
NAME (BITCH)

13. The facts supporting the plaintiff's claim of discrimination are as follows:

LOST WAGES FOR SUSPENSION, WARNING NOTICES
ROSE SWANIGAN.

All & Any MEETINGS I WAS YELLED AT AND
TALKED TO IN A VERY DEMEANING. Constantly
told I WOULDN'T SURVIVE. etc.

14. [AGE DISCRIMINATION ONLY] Defendant knowingly, intentionally, and willfully discriminated against the plaintiff.

15. The plaintiff demands that the case be tried by a jury. ☐ YES ☐ NO

16. THEREFORE, the plaintiff asks that the court grant the following relief to the plaintiff [check all that apply]

- (a) ☐ Direct the defendant to hire the plaintiff.
- (b) ☐ Direct the defendant to re-employ the plaintiff.
- (c) ☐ Direct the defendant to promote the plaintiff.
- (d) ☐ Find that the defendant failed to reasonably accommodate the plaintiff's religion.
- (e) ☐ Find that the defendant failed to reasonably accommodate the plaintiff's

disabilities.

- (f) ☒ Direct the defendant to (specify): Rescind warnings, Repay

lost wages FOR INVALID SUSPENSION to make
whole FROM FINANCIAL INCONVENIENCE.

(g) ☒ If available, grant the plaintiff appropriate injunctive relief, lost wages, liquidated/double damages, front pay, compensatory damages, punitive damages, prejudgment interest, post-judgment interest, and costs, including reasonable attorney fees and expert witness fees.

(h) ☐ Grant such other relief as the Court may find appropriate.

(Plaintiff's signature)

Gerald Figgs

(Plaintiff's name)

GERALD FIGGS

(Plaintiff's street address)

5022 S. Woodlawn 2E

(City) CHICAGO (State) IL (ZIP) 60615

(Plaintiff's telephone number)

(773) - 373-3538